

P.O. BOX 110 3580 SALT POINT ROAD WATKINS GLEN, NY 14891-0110 607/535-2721

November 6, 2009

US EPA Region 2 Attention: Mr. Luis Rodriguez Drinking & Groundwater Protection Branch 290 Broadway New York, NY 10007-1866

Re.: MITs – US Salt LLC Brinefield

Dear Mr. Rodriguez:

Our contract geologist, Larry Sevenker, has completed MIT work on stratographic test wells in the US Salt LLC brinefield. Application to convert these wells for solution mining will be submitted to NYS DEC.

Enclosed please find copies of:

1. MIT reports for wells 47 and 55.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

Robert Traver Technical Manager

Peter Briggs - NYSDEC Dave Crea

Frank Pastore (Cover)

xc:



LARRY SEVENKER

Consulting Engineer

4148 Loire Dr. Kenner, LA 70065

(504) 468-1909

October 09, 2009

Mr. Dave Crea US Salt Company P.O. Box 110 Watkins Glen, NY 14891

RE: MIT Well 47

Dear Dave:

A water/brine interface MIT pressure test was conducted on well 47. The well 47 casing was pressured with fresh water for the MIT and well 51 casing was used as the reference well containing saturated brine. The testing was conducted to assure mechanical integrity of the well 47 casing of 8-5/8" 32# at 2605' (perforated). Water was pumped to within 50' of the perforations of the casing. The well was allowed to stabilize before the mechanical integrity test on the 8-5/8" casing. Well 51 was used as the reference well and the brine was determined to be saturated. Well 51 has 5-1/2" casing cemented to 2209'. The gallery consists of wells 47, 48, 50, 51, 55 and 56. Wells 48, 56 and 50 were allowed to operate while the water/ brine interface MIT was conducted with well 47 as the test well and well 51 as the reference well.

Well 47 was pressured with 6540 gallons of fresh water. After the pump was shut off and the valves closed, the static wellhead pressure stabilized and the pressure test started using Ashcroft Digital Test Gauges. Pressure recordings were recorded at two hour intervals for 8 hours. Well 47 passed the EPA's MIT casing pressure test requirements for the water/ brine interface pressure test.

MIT of Well 47 API 31-097-61203

Well 47 Construction

VVCII 47 CONSTRUCTIO	<u>'1 1</u>			
Date Drilled	June 25, 1	1972		
Elevation			781'	
Surface Casing	13-3/8"	48#	104'	Cemented 250 sx Pozmix
Production Casing	8-5/8"	32#	2905'	Cemented 2094 sx Pozmix
Casing Liner	5-1/2"	15.5#	2920'	Pulled Out
Top of Salt			2124'	
Bottom of Salt			2930'	
Total Depth			2687'	

Logging Date: July 05, 1999 Log Run: Gamma Ray

MIT Date: October 07, 2009

Ashcroft Digital Test Pressure Gauge Serial #s at Wells 47 & 51, respectively:

	1304540		1304548		
<u>Time</u>	<u>Well 47</u>		Well 51	Press. Diff	<u>Remarks</u>
09:00 am	305.33 psi		137.23 psi	168.10 psi	Start test
11:00 pm	311.03 psi		142.50 psi	168.53 psi	
01:00 pm	315.35 psi		146.42 psi	168.93 psi	
03:00 pm	314.66 psi		146.02 psi	168.64 psi	
05:00 pm	310.51 psi		142.07 psi	168.44 psi	End test
Avg Start	305.33 psi	-	137.23 psi =	168.10 psi	
Avg End	<u>310.51 psi</u>	-	<u>142.07 psi</u> =		
Change =	+ 5.18 psi		+ 4.84 psi	+ 0.34 psi	

Calculation of Net Pressure Change Rate (NPCR):

(Avg Start - Avg End) / Test Hours (168.10 psi - 168.44 psi) / 8 Hrs = - 0.043psi / Hr

For MIT 8 hour test, NPCR was - 0.043 psi / Hour, which is within Test-Pass Limits of +/- 0.05 psi / Hr, therefore...

Well 47 passed the EPA MIT for Water/Brine Interface Test Criteria with - 0.043 psi / Hr NPCR on October 07, 2009.

If you have any questions or comments, please contact me at 504-468-1909.

Sincerely,

Larry Sevenker

Consulting Engineer



LARRY SEVENKER

Consulting Engineer

4148 Loire Dr. Kenner, LA 70065

(504) 468-1909

October 09, 2009

Mr. Dave Crea US Salt Company P.O. Box 110 Watkins Glen, NY 14891

RE: MIT Well 55

Dear Dave:

A water/brine interface MIT pressure test was conducted on well 55. The well 55 casing was pressured with fresh water for the MIT and well 51 casing was used as the reference well containing saturated brine. The testing was conducted to assure mechanical integrity of the well 55 casing of 8-5/8" 32# at 2638' (perforations). Water was pumped to within 55' of the perforations of the casing. The well was allowed to stabilize before the mechanical integrity test on the 8-5/8" casing. Well 51 was used as the reference well and the brine was determined to be saturated. Well 51 has 5-1/2" casing cemented to 2209'. The gallery consists of wells 47, 48, 50, 51, 55 and 56. Wells 48, 56 and 50 were allowed to operate while the water/ brine interface MIT was conducted with well 55 as the test well and well 51 as the reference well.

Well 55 was pressured with 6682 gallons of fresh water. After the pump was shut off and the valves closed, the static wellhead pressure stabilized and the pressure test started using Ashcroft Digital Test Gauges. Pressure recordings were recorded at two hour intervals for 8 hours. Well 55 passed the EPA's MIT casing pressure test requirements for the water/ brine interface pressure test.

MIT of Well 55

API 31-097-12548

Well 55 Construction

Date Drilled

January, 1977

Elevation

806'

Surface Casing

13-3/8"

NA#

40' Cemented 2 yds Portland 2638' Cemented 1300 sx Pozmix

Production Casing 8-5/8" Top of Salt

32#

Bottom of Salt

2162' 2954'

Total Depth

2516'

Logging Date: July 02, 1999

Log Run: Gamma Ray

MIT Date: October 08, 2009

Ashcroft Digital Test Pressure Gauge Serial #s at Wells 55 & 51, respectively:

1304548		1304540		
Well 55		<u>Well 51</u>	Press. Diff	<u>Remarks</u>
301.56 psi		141.31 psi	160.25psi	Start test
303.99 psi		143.85 psi	160.14 psi	
306.03 psi		145.76 psi	160.27 psi	
305.17 psi		145.05 psi	160.12 psi	
302.02 psi		142.15 psi	159.87 psi	End test
301.56 psi	-			
302.02 psi	_	142.15 psi =	159.87 psi	
+ 0.46 psi		+ 0.84 psi	- 0.38 psi	
	Well 55 301.56 psi 303.99 psi 306.03 psi 305.17 psi 302.02 psi 301.56 psi 302.02 psi	Well 55 301.56 psi 303.99 psi 306.03 psi 305.17 psi 302.02 psi 301.56 psi 302.02 psi	Well 55 Well 51 301.56 psi 141.31 psi 303.99 psi 143.85 psi 306.03 psi 145.76 psi 305.17 psi 145.05 psi 302.02 psi 142.15 psi	Well 55 Well 51 Press. Diff 301.56 psi 141.31 psi 160.25psi 303.99 psi 143.85 psi 160.14 psi 306.03 psi 145.76 psi 160.27 psi 305.17 psi 145.05 psi 160.12 psi 302.02 psi 142.15 psi 159.87 psi 301.56 psi - 141.31 psi = 160.25 psi 302.02 psi - 142.15 psi = 159.87 psi

Calculation of Net Pressure Change Rate (NPCR):

(Avg Start - Avg End) / Test Hours (160.25 psi – 159.87 psi) / 8 Hrs = 0.048psi / Hr

For MIT 8 hour test, NPCR was 0.048 psi / Hour, which is within Test-Pass Limits of +/-0.05 psi / Hr, therefore...

Well 55 passed the EPA MIT for Water/Brine Interface Test Criteria with 0.048 psi / Hr NPCR on October 08, 2009.

If you have any questions or comments, please contact me at 504-468-1909.

Sincerely,

Larry Sevenker

Consulting Engineer